

Stakeholder Comments Template

Ancillary Services Focus Group 3

This template has been created for submission of stakeholder comments on the Ancillary Services Focus Group 3, which took place on June 25, 2025. The meeting presentation and other information related to this initiative may be found on the [CAISO.com calendar](https://www.caiso.com/calendar) and under [Miscellaneous Meetings](#).

Upon completion of this template, please submit it to ASnotifications@caiso.com.

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Submissions are requested by close of business on **July 9, 2025**

Submitted by	Organization	Date Submitted
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Please provide your organization's comments on the following issues and questions.

1. Please provide your feedback on the Ancillary Services Focus Group 3, held on June 25, 2025.

Six Cities' Comments: The Six Cities appreciate the CAISO's responsiveness to concerns raised by stakeholders regarding the previous proposal to require broadly worded attestations by providers of Ancillary Services ("AS") and generally support the alternative proposal for supplementing CAISO's testing program for AS capability as described in the June 25, 2025 Focus Group 3 meeting. Specifically, the Six Cities support (i) forgoing a generalized attestation requirement for AS resources or Scheduling Coordinators, (ii) clarifying CAISO's expectations regarding provider monitoring and testing of the capability of their AS resources through Business Practice Manual ("BPM") provisions or Operating Procedures, (iii) continuing targeted testing of resources by the CAISO as described at Slide 9 of the Focus Group 3 presentation, (iv) implementing a targeted, resource-specific data request process when necessary to supplement CAISO testing processes, as described at Slides 8 and 10 of the presentation, and (v) maintaining the ability of

AS providers to request certification testing by the CAISO. In drafting related BPM provisions and proposed Operating Procedures, the Six Cities continue to urge the CAISO to be as specific as possible in describing expectations for monitoring and testing scope, criteria, procedures, and cadence and to utilize CAISO testing protocols as guidance. In addition, it will be important to ensure that AS testing expectations are consistent with tariff requirements for AS. The Six Cities look forward to working with the CAISO to develop appropriate monitoring and testing guidelines for AS providers.